

HONORABLE MICHELLE PETERSON

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

NANNETTE BASA, an individual,  
  
Plaintiff,  
  
v.  
  
BRAND SHARED SERVICES, LLC, a  
Delaware corporation,  
  
Defendant.

Case No. 2:21-cv-00754 JLR

[PROPOSED] ORDER GRANTING  
DEFENDANT BRAND SHARED  
SERVICES, LLC'S MOTION FOR  
PROTECTIVE ORDER QUASHING  
DEPOSITION OF MEG NEWMAN

**HEARING DATE:**  
**FRIDAY, SEPTEMBER 9, 2022**

*LCR 26(c) Discovery Conference  
Conducted on August 22, 2022*

BEFORE THE COURT is Defendant Brand Shared Services, LLC's Motion for Protective Order Quashing Deposition of Meg Newman. The motion includes a certification that, prior to bringing the motion, counsel for the parties (specifically, counsel for Defendant Emma Kazaryan and counsel for Plaintiff Alex Higgins) conducted a telephonic LCR 26(c) discovery conference on August 22, 2022.

The Court has considered the following:

1. Defendant Brand Shared Services, LLC's Motion for Protective Order Quashing Deposition of Meg Newman;
2. The Declaration of Meg Newman in Support of Defendant Brand Shared Services, LLC's Motion for Protective Order Quashing Deposition of Meg Newman;

3. The Declaration of Emma Kazaryan in Support of Defendant Brand Shared Services, LLC's Motion for Protective Order Quashing Deposition of Meg Newman and all exhibits thereto;

4. Plaintiff's Opposition to Defendant's Motion for Protective Order and Request for Fees Pursuant to FRCP 37;

5. Declaration of Nannette Basa in Support of Plaintiff's Opposition to Defendant's Motion for Protective Order and Request for Fees Pursuant to FRCP 37;

6. Declaration of Alex J. Higgins in Support of Plaintiff's Opposition to Defendant's Motion for Protective Order and Request for Fees Pursuant to FRCP 37 and all exhibits thereto;

7. Defendant Brand Shared Services, LLC's Reply in Support of its Motion for Protective Order Quashing Deposition of Meg Newman;

8. Reply Declaration of Emma Kazaryan in Support of Defendant's Motion for Protective Order Quashing Deposition of Meg Newman;

9. All pleadings and files in this case.

Following the review and good cause finding, it is ORDERED that Defendant's motion is GRANTED. The deposition of Meg Newman is hereby QUASHED.

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

---

---

Honorable Michelle L. Peterson

*Presented by:*

SEYFARTH SHAW LLP

Helen M. McFarland, WSBA No. 51012  
Emma Kazaryan, WSBA No. 49885  
999 Third Avenue, Ste. 4700  
Seattle, WA 98104  
P: (206) 946-4910  
F: (206) 260-8839  
[hmcfarland@seyfarth.com](mailto:hmcfarland@seyfarth.com)  
[ekazaryan@seyfarth.com](mailto:ekazaryan@seyfarth.com)